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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SHAREHOLDER REPRESENTATIVE SERVICES LLC, a Colorado limited liability company, Plaintiff, - against – SCRIBBLE TECHNOLOGIES INC., a Canadian corporation; and Does 1 through 20, Defendant.	:	**No. _________________** **NOTICE OF REMOVAL**

PLEASE TAKE NOTICE that, pursuant to 28 U.S.C. §§ 1332(a), 1441 and 1446, Defendant Scribble Technologies, Inc. ("Scribble Technologies") hereby removes this action from the Supreme Court of the State of New York, County of New York, to the United States District Court for the Southern District of New York. In support of this notice, Scribble Technologies states:

1. Plaintiff commenced this action by filing a Summons and Complaint in the Supreme Court of the State of New York, County of New York, on or about March 10, 2017, under Index No. 651298/2017.

2. Plaintiffs served a copy of the Summons and Complaint on March 17, 2017. This Notice of Removal is timely under 28 U.S.C. § 1446(b), as it is filed within thirty days after the receipt by Defendant, through service or otherwise, of a copy of the initial pleading setting forth the claim for relief upon which such action or proceeding is based. 28 U.S.C. § 1446(b).

3. A copy of the Summons and Complaint is attached hereto as Exhibit A. A copy of a Request for Judicial Intervention and Addendum filed by Plaintiff is attached hereto as Exhibit B. No other pleadings or other proceedings have been filed or taken to date.

4. Prior to filing suit in State Court, Plaintiff filed a nearly identical complaint in the matter captioned, *Shareholder Representative Services, LLC v. Scribble Technologies, Inc.*, Civil Case No. 17-cv-00286-VSB (S.D.N.Y.). A notice of voluntary dismissal was filed on March 13, 2017, and so ordered by the Court on March 17, 2017.

This Court's Original Jurisdiction Pursuant to 28 U.S.C. § 1332

5. This Court has original jurisdiction over this civil action pursuant to 28 U.S.C. § 1332 because the matter in controversy exceeds the sum or value of $75,000, exclusive of interest and costs, and is between citizens of different states and citizens or subjects of a foreign state; or citizens of different states and in which citizens or subjects of a foreign state are additional parties.

6. The Complaint alleges breach of contract and seeks over $10 million in damages.

7. Upon information and belief, at the time this action was commenced, Plaintiff was, and currently is, a Colorado limited liability company with its principal place of business in Denver, Colorado. Upon information and belief, Plaintiff's address is 1614 15th Street, Suite 200, Denver, Colorado 80202.

8. At the time this action was commenced, Defendant Scribble Technologies was, and currently is, a corporation established by and existing under the laws of Ontario, Canada, with its principal place of business in Toronto, Canada. Scribble Technologies was served on March 17, 2017.

9. No party is a citizen of the State of New York.

Removal Pursuant to 28 U.S.C. § 1441(a)

10. The Complaint alleges breach of contract and seeks over $10 million in damages.

11. Other than unidentified defendants (Does 1 through 20), no other defendants have been named in this action.

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12. Defendant Scribble Technologies hereby appears solely for the purpose of removal and for no other purpose and reserves all defenses available to it.

Dated: New York, New York
March 21, 2017

DEBEVOISE & PLIMPTON LLP

By: */s/ Maura K. Monaghan*
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